# EXHIBIT A

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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Richard Kadrey, et al.,              )
Individual and Representative )
Plaintiffs,                          )          CASE NO.
                                     )          3:23-cv-03417-VC
          -against-                  )
                                     )
Meta Platforms, Inc.,                )
     Defendant.                      )
_____)

\*\*\* HIGHLY CONFIDENTIAL \*\*\*
ATTORNEYS' EYES ONLY
VIDEO-RECORDED DEPOSITION OF
MELANIE KAMBADUR


Cooley, LLP
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New York, New York  10001


09/17/2024
9:07 a.m. (EDT)


REPORTED BY:  MONIQUE CABRERA


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 1          Q.    Is it also known as Libgen?

 2          A.    Yes.

 3          Q.    What do you understand that to be?

 4          A.    A dataset that contains books and

 5     scientific articles.

 6          Q.    Was Libgen used to pre-train any of

 7     the Llama models?

 8          A.    Yes.

 9          Q.    Which ones?

10          A.    I know of it being used for Llama 3.

11     It was not used for Llama 1 and Llama 2.

12          Q.    Llama 3.1 is from the paper.  Is

13     Llama 3 different from Llama 3.1?

14          A.    Llama 3.1, yes, it's different.

15          Q.    Was Libgen used to pre-train the

16     Llama 3 series of models?

17          A.    Yes.

18          Q.    So you mentioned that you had a high

19     level of understanding of what Libgen was.  Do

20     you know specifically what type of media are

21     included in Library Genesis?

22          A.    No, I don't know specifically.
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 1          Q.    But you know it contains books?

 2          A.    Yes.

 3          Q.    Do you know if it contains

 4    copyrighted books?

 5          A.    I don't know the specific books on

 6    Libgen.

 7          Q.    Have you ever examined what was in

 8    the Libgen dataset?

 9                MR. WEINSTEIN:  Object to form.

10          A.    I recall seeing some high level

11    summary statistics.

12    BY MR. YOUNG:

13          Q.    Do you know if there are any books

14    that are written in the last 50 years on Libgen?

15          A.    I believe so.  But, again, I haven't

16    directly seen -- I don't directly recall any

17    books titles.

18          Q.    Was there someone at Meta who was

19    responsible for the implementation of Libgen as

20    pre-training data for the Llama 3 models?

21          A.    What do you mean "the implementation

22    of Libgen"?
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